

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY  
OF CALIFORNIA, INC.,  
A CALIFORNIA CORPORATION,

PLAINTIFF,

VS.

NO. C 420 153

GERALD ARMSTRONG, ET AL.,

DEFENDANTS.

DEPOSITION OF GERALD DAVID ARMSTRONG

AUGUST 17, 1982

VOLUME I

Reported by GREGORY R. ADELSON, C.S.R. NO. 1873

*Gregory R. Adelson*

CERTIFIED SHORTHAND REPORTERS

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1 COMMUNICATION KIND OF DRILLS -- SITTING DOWN AND, YOU KNOW,  
2 LOOKING AT ANOTHER PERSON OR ACKNOWLEDGING ANOTHER PERSON'S  
3 RESPONSES, ORIGINATING COMMUNICATIONS, AND THAT SORT OF THING.

4 Q WHAT WAS YOUR NEXT INVOLVEMENT WITH SCIENTOLOGY?

5 A THEN I WENT -- I GOT A JOB AT THAT FRANCHISE AND  
6 WORKED THERE FOR A FEW MONTHS.

7 Q WHAT WAS THE JOB?

8 A I HAD VARIOUS JOBS AT THAT POINT. I WAS GIVING  
9 INTRODUCTORY LECTURES, RUNNING THAT SAME COURSE, SELLING BOOKS,  
10 WRITING LETTERS, GETTING PEOPLE IN -- THAT SORT OF THING.

11 Q ARE YOU FAMILIAR WITH THE TERM HAT, H-A-T?

12 A YEAH.

13 Q DID YOU HAVE A HAT AT THAT TIME?

14 A NO.

15 Q WHAT WAS YOUR NEXT AFFILIATION, POST OR EMPLOYMENT  
16 WITH THE CHURCH OF SCIENTOLOGY?

17 A IN THE BEGINNING OF 1971 I JOINED THE SEA ORGANIZA-  
18 TION IN LOS ANGELES.

19 Q WHAT IS THE SEA ORGANIZATION?

20 A THAT IS A VERY DIFFICULT QUESTION. I HAVE BEEN  
21 TRYING TO ANSWER THAT FOR A LONG TIME.

22 MR. KOHLWECK: LET THE RECORD REFLECT THAT A CONSIDERABL  
23 AMOUNT OF TIME IS PASSING.

24 MS. DRAGOJEVIC: I AM GOING TO OBJECT TO THAT.

25 THE WITNESS: I THINK THAT IS A VERY DIFFICULT QUESTION  
26 TO ANSWER. IT HAS SO MANY FACETS TO IT. I KNOW WHAT IS  
27 CLAIMED ON ONE SIDE AS A PR LINE, AND I KNOW WHAT IS CLAIMED  
28 THE OTHER SIDE. AND IT IS VERY DIFFICULT TO MAKE THE TWO



1 Q WHEN WAS THE LAST DATE THAT YOU WERE A MEMBER OF  
2 THE SEA ORGANIZATION, AS FAR AS YOU ARE CONCERNED?

3 A DECEMBER 12TH -- AROUND THERE. IT TOOK A DAY OR  
4 SO TO GET ALL OF MY MATERIALS OUT, BUT THAT IS REALLY IT.

5 Q WHAT IS THE SIGNIFICANCE OF DECEMBER 12TH?

6 A SIGNIFICANCE? THAT'S WHEN I LEFT.

7 Q NOW, WE ARE TALKING ABOUT DECEMBER 12, 1981?

8 A YES.

9 Q HOW DID YOU LEAVE?

10 A I WALKED OUT THE DOOR.

11 Q DID YOU SIGN ANY DOCUMENTS ON YOUR WAY OUT THE  
12 DOOR, OR PRIOR TO LEAVING?

13 A I SENT A LETTER TO MY SENIOR.

14 Q WHAT DID THAT LETTER SAY?

15 A IT SAID THAT I'M RESIGNING.

16 Q RESIGNING FROM WHAT?

17 A I SAID I WAS RESIGNING FROM THE SEA ORG AND THE  
18 ARCHIVES POST.

19 Q AND FROM THE CHURCH OF SCIENTOLOGY OF CALIFORNIA?

20 A NO. I NEVER CONSIDERED MYSELF A MEMBER OF THAT.

21 Q WHAT DID YOU CONSIDER YOURSELF A MEMBER OF?  
22 JUST THE SEA ORGANIZATION?

23 A THE SEA ORGANIZATION AND MAINLY THE ARCHIVES POST.

24 Q LET'S TALK ABOUT THE ARCHIVES POST.

25 AS YOU UNDERSTAND IT, WHAT WAS THE ARCHIVES POST?

26 A THAT WAS AN ACCUMULATION OF MATERIALS OF L. RON  
27 HUBBARD'S, COPYING THEM. THE MAIN FUNCTION OF IT WAS GETTING  
28 THEM TO OMAR GARRISON, WHO WAS WRITING THE BIOGRAPHY OF L. RON



1 HUBBARD.

2 Q ANY OTHER FUNCTION TO THAT POST?

3 A THERE WERE A FEW, BUT THEY WERE ATTENDANT TO THAT  
4 MAJOR ONE.

5 Q LET'S FIND OUT WHAT THEY WERE.

6 WHAT WERE SOME OF THOSE, LET'S CALL THEM, MINOR  
7 DUTIES.

8 A COPYING MATERIALS WITHIN THE ARCHIVES SO THERE WAS  
9 A COPY. WHEN I CAME ACROSS THE MATERIALS WHICH INDIVIDUALS  
10 OUTSIDE HAD, I ACQUIRED THEM. IN THIS CASE I WOULD -- I LET  
11 THE ORGANIZATION KNOW THEY WERE AVAILABLE, AND IF THEY WANTED  
12 THEM, THEN, GREAT; IF THEY DIDN'T, TOO BAD. THAT REALLY WAS  
13 MAINLY IT. I PURCHASED A BUNCH OF FILE CABINETS. I WANTED TO  
14 MAKE SURE THAT THE MATERIALS WERE, YOU KNOW, KEPT IN BETTER  
15 CONDITION THAN THEY HAD BEEN.

16 Q NOW, THESE MATERIALS WE ARE TALKING ABOUT, WHEN  
17 I STARTED THIS LINE OF QUESTIONING, YOU INDICATED THAT THESE  
18 WERE WRITINGS AND OTHER THINGS CONCERNING L. RON HUBBARD. WAS  
19 THERE ANYTHING CONTAINED IN THE ARCHIVES CONCERNING DIANETICS  
20 AND SCIENTOLOGY OR THE HISTORY OF THOSE TWO ORGANIZATIONS?

21 A OH, I THINK SO. I THINK SO, YEAH. THE MAJORITY OF  
22 WHAT I HAD WAS PROBABLY PRE-DIANETICS, PRE-SCIENTOLOGY; HOWEVER  
23 THERE WAS ALSO A GOOD CHUNK OF DIANETICS- AND SCIENTOLOGY-  
24 RELATED MATERIALS, WHICH WERE MR. HUBBARD'S, YOU KNOW, WHICH HE  
25 HAD TAKEN WITH HIM WHEREVER HE WENT OF HIS PERSONAL ACCOUNTS.

26 Q WERE THERE ALSO DOCUMENTS FROM EARLY MEMBERS OF  
27 SCIENTOLOGY? FOR INSTANCE, WERE THERE ARTICLES OR MATERIALS  
28 FROM MARY SUE HUBBARD IN THE ARCHIVES PROJECT?



1 Q DID YOU AT ANYTIME GO TO CLEARWATER DURING THE  
2 YEAR 1982?

3 A YES.

4 Q WHAT PERIODS OF TIME WAS THAT?

5 A THAT WAS THE END OF APRIL.

6 Q UNTIL WHEN?

7 A I DON'T RECALL THE DATE.

8 Q APPROXIMATELY?

9 A I WAS THERE FOR TWO DAYS -- A DAY. I WAS THERE FOR  
10 24 HOURS.

11 Q WHO DID YOU MEET WITH WHILE YOU WERE IN CLEARWATER?

12 A MICHAEL FLYNN.

13 Q ANYONE ELSE?

14 A I MET THE OTHER PEOPLE FROM HIS OFFICE.

15 Q THAT WOULD BE MR. HOFFMAN, MR. GREENE, MR. SULLIVAN?

16 A NO. MR. SULLIVAN? I DON'T RECALL MR. SULLIVAN.

17 BUT I DID MEET HOFFMAN AND GREENE.

18 Q DID YOU HAVE THE DOCUMENTS IN YOUR POSSESSION  
19 DURING THAT TRIP?

20 A NO.

21 Q HAD THEY PREVIOUSLY --

22 A I HAD A COUPLE OF DOCUMENTS AT THAT TIME.

23 Q WHICH DOCUMENTS WERE THOSE?

24 A I HAD A LETTER FROM MARY SUE AND I HAD -- I HAD A  
25 LIST OF INITIALS OF PEOPLE WHO HAD WRITTEN LETTERS AND SIGNED  
26 THEM FOR L. RON HUBBARD TO HIS SON, L. RON HUBBARD, JR.

27 Q CONCERNING THAT LETTER FROM MARY SUE HUBBARD, WHAT  
28 WAS THE CONTENTS OR CONTEXT OF THAT LETTER, AS BEST YOU CAN



1 Q BY MR. KOHLWECK: MR. ARMSTRONG, DO YOU OWN A CAR?

2 A YES.

3 Q DO YOU UNDERSTAND THE MANNER IN WHICH YOU OWN THAT  
4 CAR?

5 A YES.

6 Q USING THAT SAME DEFINITION -- AND YOU DO NOT HAVE  
7 TO TELL US WHAT IT IS -- DO YOU OWN THE DOCUMENTS THAT WE ARE  
8 NOW TALKING ABOUT?

9 A NO.

10 Q WHO DOES OWN THEM, IF YOU KNOW?

11 (DISCUSSION BETWEEN THE WITNESS AND  
12 HIS COUNSEL OUT OF THE HEARING OF  
13 THE REPORTER.)

14 THE WITNESS: L. RON HUBBARD.

15 Q BY MR. KOHLWECK: AND UPON WHAT DO YOU BASE THAT  
16 INFORMATION?

17 A THEY WERE TAKEN FROM HIS ARCHIVES AND GIVEN TO OMAR  
18 GARRISON.

19 Q WHEN YOU SAY, "HIS ARCHIVES," WHERE WERE THOSE  
20 ARCHIVES PHYSICALLY LOCATED?

21 A THEY WERE LOCATED IN A COUPLE OF LOCATIONS, VARIOUS  
22 LOCATIONS, BUT PRINCIPALLY IN GILMAN HOT SPRINGS.

23 Q DO YOU KNOW WHO OWNS TITLE TO GILMAN HOT SPRINGS?

24 A NO.

25 Q I WILL REPRESENT TO YOU THE PERSON WHOSE NAME  
26 APPEARS ON THAT DEED IS JOHN G. PETERSON, ATTORNEY AT LAW,  
27 MARINA DEL REY.

28 DO YOU HAVE ANY REASON TO DISBELIEVE MY



1 SAYING DOCUMENTS THEMSELVES, THE IDENTITY OF THE DOCUMENTS?

2 MS. DRAGOJEVIC: THE IDENTITY AND THE WAY HE CAN BEST  
3 DESCRIBE THEM HERE TODAY. MY UNDERSTANDING IS THAT THAT IS  
4 IN CATEGORIES OF DOCUMENTS.

5 MR. KOHLWECK: LET'S PROCEED WITH THAT, THEN.

6 Q WHAT CATEGORIES OF DOCUMENTS HAVE YOU PROVIDED TO  
7 COUNSEL AT THIS TIME CONCERNING MR. HUBBARD AND THE CHURCH OF  
8 SCIENTOLOGY?

9 A LETTERS BETWEEN MR. HUBBARD AND HIS FIRST WIFE,  
10 WHICH I MENTIONED EARLIER; LETTERS BETWEEN MR. HUBBARD AND HIS  
11 SECOND WIFE, WHICH I MENTIONED EARLIER -- NO, I DIDN'T MENTION  
12 HER. THAT WOULD BE SARAH NORTHRUP HUBBARD; LETTERS HAVING TO  
13 DO WITH JOHN W. PARSONS; LETTERS HAVING TO DO WITH -- CORRESPON-  
14 DENCE CONCERNING OR WITH DON PURCELL.

15 Q NOW, MR. PURCELL IS AN ATTORNEY, IS HE NOT,  
16 LICENSED IN ENGLAND?

17 A NO.

18 MS. DRAGOJEVIC: DO YOU KNOW FOR SURE ONE WAY OR THE  
19 OTHER, GERRY?

20 THE WITNESS: YEAH, I KNOW.

21 MS. DRAGOJEVIC: ALL RIGHT.

22 THE WITNESS: THERE ARE ALSO LETTERS HAVING TO DO WITH  
23 HUBBARD EXPLORATIONAL COMPANY -- CORRESPONDENCE HAVING TO DO  
24 WITH THAT. I MENTIONED THE NAVAL PAPERS ALREADY. THERE ARE  
25 A COUPLE TAPES WHICH WERE GIVEN TO ME BY BARBARA DE CELLE.

26 Q AND WHAT ARE THOSE TAPES OF?

27 A THOSE ARE TAPES OF THE MEETINGS FROM THE M.C.C.S.  
MISSION.



1 Q WAS ONE OF THOSE MISSIONS THE CONTENT OF AN  
2 AFFIDAVIT THAT YOU RECENTLY FILED AND EXECUTED ON AUGUST 11TH?

3 A YES.

4 Q ARE THERE ANY OTHER CATEGORIES OF DOCUMENTS OR  
5 MATERIALS?

6 A I BELIEVE THERE ARE. I DON'T RECALL THEM AT THE  
7 MOMENT.

8 Q OF THE CATEGORIES THAT YOU'VE JUST RECITED, HOW  
9 MANY OF THOSE CATEGORIES INCLUDE ORIGINAL MATERIALS THAT YOU'VE  
10 HAD IN YOUR POSSESSION AND CONTROL AND HAVE PROVIDED TO  
11 ATTORNEYS?

12 A MAYBE A COUPLE.

13 Q CAN YOU RECALL WHICH ONES THOSE ARE?

14 A HUBBARD EXPLORATIONAL COMPANY, AND THEN THERE WAS  
15 SOME MEMORANDUM FILES, WHICH I HAVEN'T EVEN GONE THROUGH. I  
16 SENT THOSE OFF.

17 Q WHEN DID YOU SEND THESE OFF?

18 A STARTING IN MAY I SENT OFF ABOUT THREE --  
19 MS. DRAGOJEVIC: HE SIMPLY ASKED YOU WHEN. SO JUST  
20 ANSWER THE QUESTION.

21 THE WITNESS: MAY, JULY, AUGUST.

22 Q BY MR. KOHLWECK: HAS ANYONE EVER TOLD YOU THAT  
23 HAVING THESE ORIGINAL DOCUMENTS IS ONE WAY OF FORCING L. RON  
24 HUBBARD OUT OF HIDING?

25 A NO.

26 Q YOU NEVER HEARD THAT STATEMENT?

27 MR. KOHLWECK: COUNSEL, I SHOW YOU THIS, AND WITH YOUR  
28 APPROVAL I WOULD ASK THAT WE MARK IT AS PLAINTIFF'S 4.



1 MS. DRAGOJEVIC: APPARENTLY AT THE LAST PAGE OF THIS  
2 DOCUMENT YOU HAVE JUST HANDED ME, WHICH IS ENTITLED "SUPPLE-  
3 MENTAL AFFIDAVIT OF GERRY ARMSTRONG," FILED IN THE TONJA  
4 BURDEN CASE, THERE IS A DIFFERENCE IN THAT APPARENTLY THE  
5 SIGNATURE UNDER PENALTY OF PERJURY IS MISSING. THERE IS NO  
6 SIGNATURE.

7 Q BY MR. KOHLWECK: OUTSIDE OF THAT DIFFERENCE, DO  
8 YOU RECOGNIZE THIS AFFIDAVIT, MR. ARMSTRONG?

9 A YES.

10 MR. HELLER: EXCUSE ME FOR A SECOND. THERE IS A NOTARY  
11 ATTACHED TO THE BACK. YOU HAVE REFERRED TO A SIGNATURE UNDER  
12 PENALTY OF PERJURY. DO YOU MEAN THE SIGNATURE ON THE BOTTOM  
13 OF THIS IS MISSING?

14 MS. DRAGOJEVIC: MR. ARMSTRONG BELIEVES WHEN HE PREPARED  
15 AN AFFIDAVIT, WHICH APPEARS TO BE THIS AFFIDAVIT THAT I'VE BEEN  
16 HANDED BY COUNSEL, THERE WAS A SIGNATURE AT THE END IN  
17 ADDITION TO THIS PARTICULAR NOTARIZATION PAPER. SO THIS MAY OR  
18 MAY NOT BE THE PARTICULAR SUPPLEMENTAL AFFIDAVIT MR. ARMSTRONG  
19 PREPARED.

20 Q BY MR. KOHLWECK: MR. ARMSTRONG, IF YOU WOULD,  
21 WOULD YOU TAKE A LOOK AT THIS AND SEE IF, WITH THE EXCEPTION OF  
22 THE SIGNATURE LINE AND THE AFFIRMATION THAT YOU ARE SIGNING THIS  
23 UNDER PENALTY AND PAINS OF PERJURY, DOES THIS APPEAR TO BE THE  
24 AFFIDAVIT THAT YOU RECENTLY EXECUTED?

25 A YES.

26 MR. KOHLWECK: I WILL REPRESENT THIS IS AN IDENTICAL  
27 COPY THAT I WILL HAVE MARKED AS PLAINTIFF'S 4.

(THE AFOREMENTIONED SUPPLEMENTAL



1 AFFIDAVIT OF GERRY ARMSTRONG, RE BURDEN  
2 VS. CHURCH OF SCIENTOLOGY OF CALIFORNIA,  
3 WAS MARKED BY THE REPORTER AS PLAINTIFF'S  
4 EXHIBIT NO. 4 (A-F) FOR IDENTIFICATION.  
5 AND IS ATTACHED HERETO.)

6 Q BY MR. KOHLWECK: MR. ARMSTRONG, DIRECTING YOUR  
7 ATTENTION TO PAGE 3 OF THIS AFFIDAVIT -- EXCUSE ME.  
8 DIRECTING YOUR ATTENTION TO PAGE 2, THERE APPEARS TO BE SOME  
9 INDENTED AND QUOTED PARTICULARS HERE THAT IS SINGLE SPACED.  
10 IS THIS IN PART TRANSCRIPTS OF THAT TAPE THAT YOU STATED YOU  
11 RECEIVED FROM BARBARA DE CELLE?

12 A YES.

13 Q AND CONTINUING ON TO THE NEXT PAGE AND THE PAGES  
14 THEREAFTER, IS ALL THIS INDENTED AND QUOTED MATERIAL FROM THOSE  
15 TAPES?

16 A YES.

17 Q IS CHARLES PARSELLE, LISTED ON PAGE 3, A RELATION  
18 OF DON PURCELL?

19 A NOT THAT I KNOW OF. PURCELL IS P-U-R-C-E-L-L;  
20 PARSELLE IS P-A-R-S-E-L-L-E.

21 Q BY MR. KNOHWECK: DO YOU KNOW IF CHARLES PARSELLE  
22 IS AN ATTORNEY LICENSED AS A BARRISTER IN ENGLAND?

23 A NO.

24 Q YOU DON'T KNOW THAT TO BE TRUE OR UNTRUE?

25 A NO.

26 Q THE NEXT LINE DOWN, WHICH IS PARAGRAPH (B) OF THE  
27 INDENTED TEXT, IT STATES: "ALAN WERTHEIMER, ATTORNEY FOR  
28 L. RON HUBBARD . . . ."



1 BY THIS REFERENCE, DO YOU UNDERSTAND MR. WERTHEIMER  
2 TO BE AN ATTORNEY?

3 A YES.

4 Q DO YOU UNDERSTAND THE CONTENTS OF THIS TAPE TO BE  
5 A TAPE-RECORDED SESSION BETWEEN ATTORNEYS AND CLIENTS?

6 A AT LEAST ONE OF THEM, YES. NOT THIS ONE, BUT  
7 PERHAPS THIS ONE (INDICATING).

8 Q ARE THESE ALL PART OF THE SAME TAPE?

9 A NO.

10 Q THEY ARE TWO SEPARATE TAPES?

11 A YES.

12 Q FOR PURPOSES OF THE COURT, SO WE DON'T CONFUSE IT,  
13 YOU ARE INDICATING THE BOTTOM OF PAGE 2 IS DIFFERENT FROM THE  
14 BOTTOM OF PAGE 3 AND THE TEXT FOLLOWING THAT?

15 A YES.

16 Q DO YOU HAVE ANY REASON TO BELIEVE THAT THE  
17 PARTICIPANTS IN THIS CONVERSATION DID NOT MEAN THE CONVERSATION  
18 TO BE CONFIDENTIAL AT THE TIME THAT IT TOOK PLACE?

19 A CAN YOU REWORD THAT? I DIDN'T UNDERSTAND IT.

20 Q DO YOU HAVE ANY REASON TO BELIEVE THAT THIS  
21 CONVERSATION THAT STARTS ON PAGE 3 AT THE BOTTOM OF YOUR  
22 AFFIDAVIT WAS NOT MEANT BY THE PARTICIPANTS TO BE A CONFIDENTIAL  
23 CONVERSATION? BY "CONFIDENTIAL," I MEAN AN EXCHANGE BETWEEN  
24 ATTORNEYS AND CLIENTS.

25 A NO.

26 Q IF BARBARA DE CELLE WERE TO TESTIFY UNDER OATH THAT  
27 AT NO TIME DID SHE GIVE YOU THESE TAPES, WOULD SHE BE  
28 COMMITTING PERJURY?



1 A YES.

2 Q WHEN DID SHE GIVE YOU THE TAPE?

3 A IN THE LATTER PART OF 1980 -- I'M SORRY. 1981.

4 Q HOW LATTER? AFTER YOU HAD BROKEN POST?

5 A NO.

6 Q WHILE YOU WERE STILL ON POST AS THE ARCHIVIST?

7 A (WITNESS NODS HEAD UP AND DOWN.)

8 Q WHAT DID SHE SAY TO YOU WHEN SHE GAVE YOU THE TAPE?

9 A SHE SAID, "WE DON'T HAVE ANY MORE USE FOR THESE  
10 THINGS. YOU CAN HAVE THEM."

11 Q DID SHE MEAN THE CONVERSATION ON THE TAPE OR DID  
12 SHE MEAN THE TAPE ITSELF?

13 A SHE DIDN'T SAY. THEY HAD BEEN SITTING ON HER DESK  
14 FOR ALMOST A YEAR. AND SHE SAID, "TAKE THEM."

15 Q DID YOU HAVE ANY UNDERSTANDING?

16 MS. DRAGOJEVIC: OF WHAT?

17 Q BY MR. KOHLWECK: WHETHER THE TAPES WERE TO BE  
18 ERASED OR WHETHER YOU COULD USE ANYTHING ON THE TAPE FOR YOUR  
19 OWN PERSONAL USE?

20 MS. DRAGOJEVIC: HE'S ALREADY INDICATED THAT SHE DIDN'T  
21 SAY.

22 MR. KOHLWECK: I AM ASKING IF HE HAD AN UNDERSTANDING  
23 FROM ANY SOURCE.

24 THE WITNESS: I DON'T THINK SO. I DON'T THINK SHE  
25 THOUGHT OF IT.

26 Q BY MR. KOHLWECK: WHAT DID YOU THINK OF IT?

27 A AT THE TIME I HAD NO IDEA WHAT THEY WERE.

28 Q PREVIOUSLY YOU HAD SIGNED A CONFIDENTIALITY BOND,



1 HAD YOU NOT, KEEPING CONFIDENTIAL ALL INFORMATION OF THE CHURCH  
2 AND ITS STRUCTURE THAT CAME WITHIN YOUR CONTROL, POSSESSION,  
3 OR USE; IS THAT TRUE?

4 A THAT'S TRUE.

5 Q AND YOU WERE STILL ON POST WITH THE CHURCH AT THE  
6 TIME YOU CAME INTO POSSESSION OF THIS TAPE; IS THAT TRUE?

7 A YES.

8 Q FROM THAT DID YOU HAVE AN UNDERSTANDING THAT THE  
9 CONTENTS OF THIS TAPE SHOULD REMAIN CONFIDENTIAL?

10 A AT THE TIME I HAD NO IDEA WHAT IT CONTAINED.

11 Q WHEN DID YOU DISCOVER WHAT IT CONTAINED?

12 A IN MARCH -- NO, IN MAY.

13 Q HOW DID YOU HAPPEN TO DISCOVER THE CONTENTS?

14 A I WAS DRIVING UP TO OMAR'S PLACE, AND I WAS TAKING  
15 SOME OF HIS MATERIALS. SEE, I HAD GIVEN HIM THESE TAPES JUST  
16 TO BE USED AS TAPES FOR RECORDING CONVERSATIONS. I JUST HAPPENED  
17 TO BE ON THE WAY UP LISTENING TO SOME TAPES, AND THESE HAPPENED  
18 TO BE THEM.

19 Q HAVE YOU COME INTO THE POSSESSION OF ANY OTHER  
20 TAPES IN A SIMILAR MANNER?

21 A TWO.

22 Q HAVE YOU MADE INVESTIGATION AS TO WHAT IS RECORDED  
23 ON THOSE TAPES?

24 A NO.

25 Q HAVEN'T PLAYED THEM AT ALL?

26 A NO.

27 Q HAVE YOU PROVIDED THEM TO ANYONE ELSE?

28 A JUST OMAR.